

SJ-EXHIBIT 24

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL PRESCRIPTION MDL No. 2804
5 OPIATE LITIGATION Case No. 17-md-2804

6 This document relates to: Judge Dan
7 Aaron Polster

8 The County of Cuyahoga v. Purdue
9 Pharma, L.P., et al.

10 Case No. 17-OP-45005

11 City of Cleveland, Ohio vs. Purdue
12 Pharma, L.P., et al.

13 Case No. 18-OP-45132

14 The County of Summit, Ohio,
15 et al. v. Purdue Pharma, L.P.,
16 et al.

17 Case No. 18-OP-45090

18 VOLUME II

19 Videotaped Deposition of Joseph Rannazzisi
20 Washington, D.C.

21 May 15, 2019

22 8:43 a.m.

23 Reported by: Bonnie L. Russo

24 Job No. 3301884

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1 law.

2 BY MR. LANIER:

3 Q. All right. In the third page, you
4 go on to say, here are some circumstances that
5 might indicate there is diversion going on; is
6 that right?

7 A. Yes, sir.

8 Q. And these -- you gave four examples,
9 much like you have told us in here before, were
10 concerns that you had or that people could look
11 at -- strike that. Let me start that question
12 again.

13 You give four circumstances that
14 might indicate diversion; is that fair to say?

15 A. Yes, sir.

16 Q. Ordering excessive quantities of a
17 limited variety of controlled substance while
18 ordering few, if any, other drugs.

19 Why would that perhaps be indicative
20 or perhaps indicate diversion?

21 A. Well, for the most part, pharmacies
22 generally follow a pattern of ordering for
23 controlled substances and depending on what we
24 have read, it could be anywhere as low as 9
25 percent to up to 12 or 13 percent as the

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1 average. So it is a red flag when a pharmacy
2 is ordering, you know, 40, 50 percent of their
3 drugs has controlled substances, you know, and
4 looking at the legend or the noncontrolled
5 drugs, you've got to ask questions.

6 Why are you not ordering? If you
7 are a full service pharmacy, why are you not
8 ordering noncontrolled legend drugs?

9 Q. All right. So we've got a red flag
10 on that.

11 The second one you gave is ordering
12 a limited variety of controlled substances in
13 quantities that are disproportionate, not in
14 proportion, to the quantity of noncontrolled
15 medications ordered.

16 Is that also a red flag?

17 A. Again, same concept. No. 1 handles,
18 you know, where we are only ordering large
19 quantities of oxycodone, hydrocodone, nothing
20 else or oxycodone, hydrocodone, alprazolam.

21 The second one is again, you are
22 taking the hydrocodone and the oxycodone and it
23 is far exceeding what you are ordering normal
24 noncontrolled drugs. So it's disproportional.

25 If the normal pharmacy is ordering